

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re: Patricia Townes, <div style="text-align: center;">Debtor,</div> Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1, <div style="text-align: center;">Movant,</div> v. Patricia Townes, <div style="text-align: center;">Debtor/Respondent,</div> Kenneth E. West, <div style="text-align: center;">Trustee/Respondent.</div>	Bankruptcy No. 24-10682-pmm Chapter 13 Related to Doc. No. 18
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**FEDERAL HOME LOAN MORTGAGE CORPORATION’S OBJECTION TO
CONFIRMATION OF
DEBTOR’S CHAPTER 13 PLAN**

Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1, (“FEDERAL HOME LOAN MORTGAGE CORPORATION”), by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtor, Patricia Townes, and in support thereof alleges as follows:

1. Debtor, Patricia Townes, filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 29, 2024.
2. FEDERAL HOME LOAN MORTGAGE CORPORATION holds a security interest in the Debtor’s real property located 2216 Mifflin Street, Philadelphia, PA 19145 (the

“Property”), by virtue of a Mortgage recorded with the Philadelphia County Recorder of Deeds on January 12, 2000 in Instrument No.51356593 which has ultimately been assigned to FEDERAL HOME LOAN MORTGAGE CORPORATION.

3. Said Mortgage secures a Note in the amount of \$48,000.00.
4. Upon review of internal records, it is anticipated that FEDERAL HOME LOAN MORTGAGE CORPORATION’s Proof of Claim will include a pre-petition arrearage of approximately \$2,586.12 a true and correct copy of the pre-petition arrearage is attached hereto as Exhibit “A.”
5. On April 1, 2024, Debtor filed a Chapter 13 Plan (the “Plan”). A true and correct copy of the Plan is attached hereto as Exhibit “B.”
6. The Plan fails to account for the full pre-petition arrearage of \$2,586.12, as it only provides a total of only \$843.88 that will be paid to Secured Creditor through the Plan. See Exhibit “B.”
7. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee’s Office.
8. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) that FEDERAL HOME LOAN MORTGAGE CORPORATION hereby objects to Debtor’s proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

WHEREFORE, Secured creditor Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1, respectfully requests that this Court not confirm the Chapter 13 Plan of Debtor Patricia Townes.

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane &
Partners, PLLC**

Authorized Agent for Secured Creditor
13010 Morris Rd., Suite 450
Alpharetta, GA 30004
Phone: (470) 321-7112
Fax: (404) 393-1425

By: /s/Michelle L. McGowan, Esq.
Michelle L. McGowan, Esq., Esquire
Pennsylvania Bar Number 62414 PA
Email: mimcgowan@raslg.com

Date: April 29, 2024

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 29, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Michael A. Cibik
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

Patricia Townes
2216 Mifflin St
Philadelphia, PA 19145-2738

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane &
Partners, PLLC**

Authorized Agent for Secured Creditor
13010 Morris Rd., Suite 450
Alpharetta, GA 30004
Phone: (470) 321-7112
Fax: (404) 393-1425

By: /s/Michelle L. McGowan, Esq.
Michelle L. McGowan, Esq., Esquire
Pennsylvania Bar Number 62414 PA
Email: mimcgowan@raslg.com